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August 10, 2018

Via ECF

The Honorable Joseph F. Bianco, U.S.D.J.
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

The Honorable Gary R. Brown, U.S.M.J.
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Buchanan, et al. v. Pay-O-Matic Check Cashing Corp., et al.*
Case No. 18 CV 885 (JFB) (GRB)

Dear Judge Bianco and Magistrate Judge Brown:

We represent Plaintiffs in the above referenced matter.

We write to notify Your Honors that the parties have agreed to attempt class and collective-wide resolution of this matter through mediation. To this end, the parties have agreed to retain the services of neutral mediator Carol A. Wittenberg of JAMS, and are presently working with Ms. Wittenberg to schedule a mediation on a mutually convenient date.

In view of the foregoing, the parties respectfully request that Your Honors stay these proceedings in all respects pending the mediation. The parties will update Your Honors on the outcome of the mediation by joint letter, no more than one week following the mediation date.

The parties have agreed that the following discovery materials will be produced by Defendants for mediation purposes:

- 1) A list in Excel format of all non-exempt Pay-O-Matic employees during the applicable period (2012 – present), of which there are approximately 6,000, identified by numbers, with job titles, classifications, and employment start and end dates, to be produced by August 29, 2018.
- 2) Records, including all payroll records, time records, wage statements, and wage and hour notices for 100 employees selected by Plaintiffs' counsel from the employee list previously provided, to be produced by September 26, 2018.
- 3) Records, including all payroll records, time records, wage statements, and wage and hour notices for an additional 200 employees selected by Plaintiffs' counsel from the employee list, to be produced by October 26, 2018.

The parties thank Your Honors for considering this matter.

Respectfully submitted,

/s/ Taimur Alamgir

Taimur Alamgir, Esq.

cc: Defendants via ECF